UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, ET AL., Plaintiffs	)	
vs.	)	C.A. No.: 03-335-L **(as to Plaintiff Michelle Spence only)**
AMERICAN FOAM CORPORATION, ET AL., Defendants	)	

DEFENDANTS ANHEUSER-BUSCH, INC. AND ANHEUSER-BUSCH COMPANIES, INC.'S ANSWER TO PLAINTIFF MICHELLE SPENCE'S FIRST AMENDED MASTER COMPLAINT AS ADOPTED

NOW COME Defendants Anheuser-Busch, Inc. ("ABI") and Anheuser-Busch Companies, Inc. ("ABC") and in response to plaintiff Michelle Spence's Notice of Adoption[1] of First Amended Master Complaint ("Notice of Adoption"),[2] ABI and ABC hereby adopt[3] their Answer and Affirmative Defenses to Plaintiffs' First Amended Master Complaint, filed on February 4, 2005, in *Gray, et al. v. Derderian, et al.*, (04-312-L).

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1 *See* Notice of Adoption of First Amended Master Complaint by Plaintiff Michelle Spence, ¶¶ 1-2 (unnumbered).

2 Although plaintiff Michelle Spence is named in the *Guindon* action, she has retained separate counsel and has filed her own Notice of Adoption in this matter, adopting only the *Gray* First Amended Master Complaint, and not the additional allegations and claims contained in the *Henault* Notice of Adoption, which appear to have been adopted by the remaining plaintiffs in the *Guindon* action.

3 *See* Order in *Gray v. Derderian* (04-312-L), dated December 16, 2004, granting plaintiffs' motion for leave to file First Amended Master Complaint and establishing procedure for plaintiffs in other actions to adopt such filing, either in whole or in part.

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Further, in response to the additional allegations contained in plaintiff Michelle Spence's Notice of Adoption, ABI and ABC state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in unnumbered paragraph 3 of plaintiff Michelle Spence's Notice of Adoption.

WHEREFORE, Defendants Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. pray that:

(a) the First Amended Master Complaint and Notice of Adoption be dismissed with prejudice as to Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc.;

(b) Plaintiff's demand for relief against Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. be denied in every respect;

(c) Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. be awarded costs in connection with this litigation, including reasonable attorneys' fees; and

(d) the Court grant such other and further relief as may be just, proper, and equitable.

DEFENDANTS ANHEUSER-BUSCH, INC. AND ANHEUSER-BUSCH COMPANIES, INC. HEREBY DEMAND TRIAL BY JURY

ANHEUSER-BUSCH, INC. AND
ANHEUSER-BUSCH COMPANIES, INC.,

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Dated: February 8, 2005

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a copy of the within document in pdf format by electronic email on the 8th day of February, 2005, to the following counsel of record:

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